

NO. 50079-5-II

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**COURT OF APPEALS, DIVISION II**  
**OF THE STATE OF WASHINGTON**

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MICHAEL W. WILLIAMS,

Appellant,

v.

DEPARTMENT OF CORRECTIONS,

Respondent.

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**BRIEF OF RESPONDENT**

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## **I. INTRODUCTION**

The Department of Corrections (DOC or Department) received a public records request from Michael Williams for a copy of a contract. The Department replied to Williams within five days with an estimate of time it needed to respond to Williams' request. The Department then timely provided within the estimated time period a copy of the contract with redactions made to protect sensitive information related to the security of its prisons. The Department also provided an Agency Denial Form explaining the redactions. The Department thus complied with the Public Records Act (PRA) in responding to Williams' request. At no point during the pendency of his request did Williams protest the Department's estimate of time and he chose to eschew the Department's optional internal appeal process. Nevertheless, Williams sued the Department alleging violations of the PRA. The trial court correctly found the Department complied with the PRA in responding to Williams' request and this Court should affirm.

## **II. STATEMENT OF THE CASE**

### **A. The Department Complied with the Public Records Act when it Timely and Fully Responded to Williams' Request**

The Public Records Unit is a centralized unit located in DOC's Tumwater headquarters building with 20 full-time staff including 3

Administrative Staff, 12 Public Disclosure Specialists, and 3 Unit Supervisors, among others. CP 98, Declaration of Denise Vaughan, at ¶ 3. DOC's PDU serves a large public agency with a large number of public records. Due to its size and the nature of its work, DOC also receives a large number of public records requests. In 2015, for example, the Department received a total of 11,804 requests, an average of more than 32 a day for every day of the year. CP 98 at ¶ 4. The majority of these requests include some claim of exemption and redaction or withholding, and so DOC's obligations under the PRA are time consuming indeed. CP 98 at ¶ 4.

Michael W. Williams is an inmate at the Coyote Ridge Corrections Center. On March 15, 2016, the Public Disclosure Unit received Williams' PRA request for copies of a contract between DOC and J-Pay, Inc. (J-Pay). CP 99-100 at ¶ 9. J-Pay kiosks provide prisoners with a means to send and receive e-mails and purchase digital music files. *Id.* Public Disclosure Specialist Mara Rivera responded to Williams' request on March 22, 2016, informing him that his request was assigned tracking number PDU-41055, and that she would respond within 33 business days, on or before May 6, 2016. CP 100 at ¶ 10. Ms. Rivera's estimate of time was derived not just from the amount of time she would need to fulfil Williams' request, but from considerations of the rest of her workload as

well, which was substantial. CP 99 at ¶¶ 7-8. Ms. Rivera sent Williams a letter on May 6, 2016, informing him that records responsive to his request were identified, and requested payment for production of copies. CP 100 at ¶ 11. DOC received Williams' payment on May 19, 2016, and on May 25, 2016 sent to Williams a copy of the contract he requested. CP 100 at ¶¶ 12-13. Because the contract contained both security information, protected from disclosure under the PRA by RCW 42.56.420(2), and proprietary information, protected from disclosure by RCW 42.56.270(11), the copies sent to Williams contained redactions. CP 100 at ¶ 13; CP 159.

Along with redacted copies of the contract, DOC sent Williams an Agency Denial Form. CP 100 at ¶ 13. The Agency Denial Form included both a statement of the specific exemptions to the PRA Ms. Rivera relied upon when making her redactions, as well as a brief explanation of how those exemptions applied. CP 159. The Agency Denial Form also referenced exemption codes. *Id.* Each redaction to the contract made by Ms. Rivera was labelled with one of these exemption codes, so that Williams could know which exemption Ms. Rivera relied on for each redaction. CP 116-157. Finally, Ms. Rivera also included an Appeal Form, which Williams chose not to use. CP 161.

**B. The Superior Court Found DOC Complied with the PRA in Responding to Williams' Request**

Williams filed this action on July 12, 2016, alleging that DOC violated the PRA. Complaint For Violation Of The Public Records Act, filed July 12, 2016. Both parties then participated in a scheduling conference under Local Rule 16(c)(1)(E) and, on November 4, 2016 the Honorable Mary Sue Wilson ordered that this matter should at first proceed solely on the issue of whether DOC violated the PRA in responding to Plaintiff's PRA request, PDU-41055. Agreed Scheduling Order, filed November 4, 2016. Williams' Opening Brief, as to whether or not there was a violation of the PRA, was filed on November 7, 2016, to which DOC responded, asserting that there was no violation of the PRA in responding to PDU-41055. CP 2-84; CP 85-161.

On January 27, 2017 both parties appeared before the Honorable Christopher J. Lanese, with Williams appearing by phone. Order of Dismissal filed January 27, 2017. After hearing from both parties, and having considered pleadings from the parties, the Court found that DOC did not violate the Public Records Act in responding to Williams' PDU-41055, and dismissed Williams' claims against DOC. *Id.* The court denied Williams' motion for reconsideration. Order Denying Motion for Reconsideration filed February 1, 2017. Williams now appeals.

### **III. STATEMENT OF THE ISSUE**

Whether the Department complied with the PRA when it timely produced all records responsive to Williams' public records request?

### **IV. STANDARD OF REVIEW**

Agency actions under the PRA are reviewed de novo. *Neighborhood Alliance of Spokane Cnty. v. Cnty. of Spokane*, 172 Wn.2d 702, 715, 261 P.3d 119 (2011). An appellate court can affirm a superior court's decision on any ground supported by the record. *Gronquist v. State*, 177 Wn. App. 389, 396 n.8, 313 P.3d 416 (2013).

### **V. ARGUMENT**

#### **A. The Trial Court Correctly Concluded that the Department Complied with the PRA when It Sent Williams a Copy of the Contract He Requested**

On March 15, 2016, DOC received Williams' request for a copy of a contract between DOC and J-Pay. CP 99-100 at ¶ 9. Five business days later, DOC employee Mara Rivera responded to Williams' request, providing an estimate of the time, 33 business days, DOC needed to respond to his request. CP 100 at ¶ 10; *see* RCW 42.56.520(3) (Prompt response requirement satisfied when agency provides a reasonable estimate of time within five business days). Williams never objected to DOC's estimate of time for a response, and 33 business days later DOC sent Williams a letter explaining to him that records responsive to his

request had been identified and would be sent to him upon receipt of payment for copying and production of those records. CP 100 at ¶ 11. Williams tendered payment for copies, and the contract was sent to Williams just four business days later, with redactions taken to protect sensitive information related to facility security. CP 100 at ¶¶ 12-13. DOC also sent Williams an Agency Denial Form, which included a statement of the specific exemptions to the PRA relied upon for any redaction taken, as well as a brief explanation of how those exemptions applied. CP 159. DOC thus complied with the PRA in responding to Williams' request. The trial court was correct to find the same, and this court should therefore affirm the dismissal of Williams' claims below.

**1. The Department Timely Responded to Williams' Request without any Undue Delay**

Williams contends that DOC sat on his request and did nothing for over thirty days. Appellant's Opening Brief at 8. He makes this claim in spite of a record which clearly establishes a substantial PRA workload for both DOC and the specialist assigned to his request. CP 98 at ¶ 4, CP 99 at ¶ 8. This Court should decline Williams' unreasonable attempt to re-prioritize DOC's obligations under the PRA, to suit his favor, and affirm the trial court's finding that there was no violation of the PRA in DOC's response to his request.

During 2015 DOC received 11,804 requests for public records, an average of more than 32 a day for every day of the year. CP 98 at ¶ 4. The majority of these requests contain sensitive information and thus require some form of redaction. *Id.* Difficulty of finding a given record, notification requirements, and workload of the assigned PDU Specialist can all increase the time needed by DOC to make a production, and so it is the assigned PDU Specialist who determines the amount of time to be offered as an estimate for a given response. CP 98-99 at ¶¶ 6-7. Here, Ms. Rivera, the assigned Specialist, promptly confirmed receipt of Williams' request and informed him that he should expect a response within 33 business days. CP 100 at ¶ 10. Thirty-three days later Ms. Rivera responded to Williams with a request for payment for production of records responsive to his request; and these records were provided to Williams within one week of receipt of his payment. CP 100 at ¶¶ 11-13. The timely response by Ms. Rivera came in spite of the facts that the records requested by Williams required review and redaction, and that she was assigned 60 new public disclosure requests, on top of her existing workload, during the pendency of Williams' request. CP 100 at ¶ 13, CP 99 at ¶ 8.

Therefore, and considering the workload of the Department, DOC's 33-business-day turnaround on Williams' request was quite

reasonable. *See Forbes v. City of Gold Bar*, 171 Wn. App. 857, 864-66, 288 P.3d 384 (2012) (evaluating reasonableness in light of the agency's workload). In fact, the PRA allows 5 days just for an initial response to a requestor, let alone redaction and review, which were required here. *See* RCW 42.56.520; CP 100 at ¶ 13. The PRA also allows for an agency to request additional time for response, something DOC did not even venture to do here, even though during the 33-day pendency of Williams' request Ms. Rivera was assigned 60 new public disclosure requests also requiring her attention. RCW 42.56.520; CP 99 at ¶ 8.

Williams puts forth *Wade's Eastside Gun Shop, Inc. v. Department of Labor and Industries* for the premise that a delayed production of records violates the PRA. *See Wade's Eastside Gun Shop, Inc. v. Dep't of Labor and Industries*, 185 Wn.2d 270, 372 P.3d 97 (2016). Williams appears to be relying on a portion of *Wade's* where a delay in production of 125 days was found to be in violation of the PRA. *See Wade's*, 185 Wn.2d at 289-90. But even aside from the fact that the 125 days in *Wade's* was nearly 4 times as long as the 33 days Ms. Rivera required here, *Wade's* differs in that *Wade's* involved an asserted justification for delay that expired shortly after it was made. *Id.* (Where the agency asserted an open investigation to justify a delay in production of records.) Ms. Rivera's justification for any delay would have been considerations

for her workload and the time it would take to fully and accurately respond to the request, which did not abate during Williams' request. CP 99 at ¶¶ 7–8. So, even if Ms. Rivera did receive the contract in question promptly, it still contained sensitive information and required review and redaction, and this needed to be done around the rest of her workload. CP 100 at ¶ 13. While Williams is certainly entitled to full assistance from the Department in the inspection of public records, he is not entitled to prioritize the Department's workload to suit his needs. Ms. Rivera's response was reasonable, especially given the workload of the Department, and this Court should affirm the trial court's finding that DOC did not violate the PRA in responding to Williams' PDU-41055.

**2. The Department Properly Redacted Information to Protect Institutional Security and Proprietary Information**

Not all records are subject to disclosure under the PRA. *See* RCW 42.56.070(1) (Agency shall make available for public inspection all public records, unless the record falls within a specific exemption). The records at issue here, a contract between DOC and J-Pay, contain both security information and proprietary data, both of which are exempt from disclosure under the PRA. CP 100 at ¶ 13; RCW 42.56.420(2); RCW 42.56.270(11). Therefore, PDU Specialist Mara Rivera correctly redacted portions of the contract before providing it to Williams. Because the

redactions were proper under specific exemptions to the PRA, this Court should affirm the superior court's finding that DOC did not violate the PRA in its response to Williams' request. *See* CP 116-157; CP 159.

The PRA provides an exemption for security information related to specific and unique vulnerability assessments at state correctional facilities at RCW 42.56.420(2). Pursuant to that exemption, Ms. Rivera made redactions to portions of the contract before they were provided to Williams. CP 100 at ¶ 13. All redactions made by Ms. Rivera implicate specific and unique vulnerabilities present at DOC facilities. CP 116-157 (where "Exemption Code 20" is attached to each redaction made). Security information redacted by Ms. Rivera included language discussing the means for search and screening of e-mails sent to and from secure DOC facilities, and how usage of J-Pay kiosks may be monitored. CP 101 at ¶ 16; CP 102–103 at ¶ 20. Security information redacted by Ms. Rivera also included timelines for contractors entering and exiting secure DOC facilities, and details of how J-Pay software can be "unlocked" to interact with other software. *Id.* The Department respectfully submits that this is exactly the type of information RCW 42.56.420(2) was intended to protect from disclosure.

The PRA also provides a specific exemption for proprietary data, trade secrets, or other information related to a vendor's unique methods of

conducting business at RCW 42.56.270(11). Some of the redactions made by Ms. Rivera were also intended to protect the proprietary data and trade secrets of DOC vendor J-Pay. CP 116-157 (where “Exemption Code 27” is attached to some of the redactions made). Redactions made by Ms. Rivera under this provision protected language detailing the unique relationship between DOC and its vendor J-Pay. This included details of the trainings J-Pay offers DOC staff, timelines of a J-Pay kiosk installation and roll-out, and information about J-Pay’s unique safeguards for ensuring appropriate kiosk usage. CP 101 at ¶ 16; CP 102–103 at ¶ 20. Where Ms. Rivera relied on this exemption, it was both judicious and within the intended scope of RCW 42.56.270(11).

Williams maintains his position that like language redacted in one place, but not another, constitutes a *per se* violation of the PRA. Appellant’s Opening Brief at 21-22. But Williams presents no authority for this premise. Furthermore, production of material exempt from disclosure under the PRA does not constitute a waiver of the right to claim those exemptions. *Sanders v. State*, 169 Wn.2d 827, 849, 240 P.3d 120 (2010). Just because Ms. Rivera either could have, or should have, made more redactions to the document provided to Williams does not constitute a violation of the PRA. Instead, the appropriate inquiry is whether the records redacted are exempt from disclosure. *Id.* Here, Ms. Rivera made

appropriate redactions under two specific statutory exemptions to disclosure under the PRA, and this Court should affirm that there was no violation in DOC's response to Williams' PDU-41055.

To the extent Williams maintains his assertion that DOC violated the PRA by making redactions he considers to be "overly broad," that claim is without merit. Appellant's Opening Brief at 20. To be clear, Williams' position in the superior court was that redaction of common articles such as "a" and "the" deprive him of context necessary to review a given document, and thus constitute a violation of the PRA. Complaint For Violation Of The Public Records Act filed July 12, 2016. But the PRA would simply be unworkable if it required this level of granularity.

*City of Lakewood v. Koenig* stands for the premise that "[p]ortions of records which do not come under a specific exemption must be disclosed." See *City of Lakewood v. Koenig*, 182 Wn.2d 87, 94, 343 P.3d 335 (2014); *Resident Action Council v. Seattle Housing Authority*, 177 Wn.2d 417, 433, 327 P.3d 600 (2013) (citing *Progressive Animal Welfare Soc'y v. Univ. of Wash.*, 125 Wn.2d 243, 261, 884 P.2d 592 (1994)). So here, while Ms. Rivera did make redactions to the contract provided to Williams, all portions of those records not covered by a specific exemption were disclosed. CP 100 at ¶ 13. Further, from 42 responsive pages, only 7 contained *any* redaction, which further illustrates that Ms.

Rivera was judicious in her redactions. CP 101-103 at ¶¶ 14–22. *City of Lakewood* simply does not stand for the proposition that redactions are per se violative of the PRA if they are not done word by word, and this Court should decline to find the same.

**3. The Department Provided Brief Explanations for the Redactions as Required under the PRA**

The PRA mandates that agencies withholding parts of public records under an exemption to disclosure provide the requestor with a statement of the specific exemption authorizing the withholding, as well as a brief explanation of how that exemption applies. RCW 42.56.210(3). The Department provided Williams with an Agency Denial Form when it produced copies of the records he requested. CP 159. The Agency Denial Form provides both the specific exemptions to the PRA relied upon by DOC, RCW 42.56.420(2) and RCW 42.56.270(11), as well as a brief explanation of how those exemptions applied. *Id* (“These records contain specific security information and protocols ....;” “These records contain proprietary information ....”). These brief explanations are sufficient to satisfy the Department’s duty under the PRA, which the trial court recognized, finding that DOC did not violate the PRA in its response to Williams’ PDU-41055. This Court should affirm that determination.

Williams asserts the Department owed him a more thorough brief explanation, and points to a Declaration of Denise Vaughan for an example of what he believes would suffice. Appellant's Opening Brief at 24-25. But just because the Department may have been able to provide more explanation does not mean that the brief explanation provided fails to satisfy RCW 42.56.210(3), nor does any case law actually support Williams' position. In *Block v. Gold Bar*, for example, another division of this Court found the mere comment "content is attorney advice to client" satisfied the brief explanation requirement. *Block v. City of Gold Bar*, 189 Wn. App. 262, 286, 355 P.3d 266 (2015). Respondent submits that Ms. Rivera, with her Agency Denial Form, CP 159, has met and exceeded the requirement identified in *Block*.

Additional case law suggests a rather low bar for the PRA's brief explanation requirement. In *Gronquist v. Department of Licensing*, this Court found a violation of RCW 42.56.210(3) only when an agency "failed to give *any* kind of explanation" when it provided redacted information to a requestor. *Gronquist v. Washington State Dep't of Licensing*, 175 Wn. App. 729, 754, 309 P.3d 538 (2013) (emphasis added). *Sanders v. State* is similar in that a violation of the brief explanation requirement was found only when an agency provided redactions "devoid of *any* explanation." *Sanders v. State*, 169 Wn.2d 827,

845-46, 240 P.3d 120 (2010) (emphasis added). The Agency Denial Form provided as part of the Department's response to Williams' request contains everything Williams needs to know about the authority relied upon for a given redaction, and how it applies. *See* RCW 42.56.210(3); CP 159. This Court should therefore affirm the superior court's finding that DOC did not violate the PRA in its response to Williams' PDU-41055.

**B. Costs and Attorney's Fees Should Not Be Awarded because Williams Is Not the Prevailing Party**

The PRA provides for costs and attorney's fees to the prevailing party. RCW 42.56.550(4); *Sanders v. State*, 169 Wn.2d 827, 865, 240 P.3d 120 (2010). Attorney's fees are only awarded when the party secures the disclosure of additional documents. *See Concerned Ratepayers Ass'n v. Public Utility Dist. No. 1 of Clark Cnty.*, 138 Wn.2d 950, 964, 983 P.2d 635 (1999). When a requester has not secured the disclosure of additional records on appeal, courts are required to remand the issue of attorney's fees to the trial court because the determination of which party is the prevailing party has not been made. *Id.*

First, Williams is not entitled to attorney's fees and costs because the trial court's decision should be affirmed. As such, Williams is not the prevailing party for purposes of appeal or this case. Even if Williams

prevails on the reversal of one or all of his claims, Williams is not the prevailing party at this time. Because the superior court found no violation, the parties were not heard as to whether the Department's response was in bad faith under RCW 42.56.565. Therefore, any reversal in this circumstance should only result in further proceedings below as to whether the Department violated the PRA, and if that violation was done in bad faith under RCW 42.56.565. It is premature to determine who the prevailing party in this case is until such a determination is made. If Williams succeeds on issues on appeal and submits a cost bill under RAP 18.1, the Department will respond to such appellate costs at that time. Therefore, in the event that this Court reverses any portion of the trial court's decision, it should remand the issue of attorney's fees to the trial court for it to determine the issue after that case is resolved and to determine the prevailing party.

## **VI. CONCLUSION**

The Department complied with the PRA when it produced all documents responsive to Williams' request, PDU-41055. The superior

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court was therefore correct in dismissing Williams' claims against the Department, and this Court should affirm.

RESPECTFULLY SUBMITTED this 2nd day of August, 2017.

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I certify that on the date below I caused to be electronically filed the foregoing BRIEF OF RESPONDENT with the Clerk of the Court using the electronic filing system and I hereby certify that I have mailed by United States Postal Service the document to the following non electronic filing participant:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED this 2nd day of August, 2017, at Olympia,  
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